

## **City of Rockford, Illinois: Petroleum Assessment Grant Application**

### **1. Community Need**

#### **a. Targeted Community and Brownfields**

##### **i. Targeted Community Description**

The City of Rockford, Illinois, a city of 152,871, was once a thriving manufacturing community, but has since faced decades of economic decline. Rockford was founded in 1837 and forms the central City in the Rockford Illinois Metropolitan Statistical Area. Early settlement and industry took place along the Rock River south of the current Downtown; with the industry using water power for the industrial processing that took place. This area, known as the Water Power District, was served shortly thereafter by the first railroad in the Rockford area which is now part the Union Pacific Railroad system. Two additional railroads later served this Water Power District, and industry spread west and south from the Water Power District railroad confluence to the South Main Rail Yards area, JI Case complex, the Barber Colman complex and beyond. Industrial development also spread along each rail line as it entered and left this rail confluence, resulting in a very complex pattern of industrial development along the rail lines that started during the 1850's and continued for approximately 100 years until modern industrial parks served by major highways began to dominate industrial development patterns. Generally speaking, in areas where two or more parallel rail lines served an area, there was usually an industrial concentration or industrial cluster. Each rail line usually followed a stream valley along part of its course through the area, an important Brownfield consideration. These early industrial developments now comprise the City of Rockford's major Brownfield concentration that we now refer to as Brownfield Corridors. These rail-served industrial areas have been left behind as the Interstate Highway system serving the region is located at the eastern and southern perimeter of the City, several miles from the Brownfield Corridors. The construction of Interstates 90 due east of the City during the 1950's as well as the US 20 Bypass due south of the City during the 1960s resulted in a dramatic shift of industrial development away from the central area and out to the industrial parks along these highways. These shifts in industrial activity and the jobs that go with this shift have all dealt serious blows to the vitality and viability of industry located in confined spaces along the rail corridors. Many of these once-thriving industries are now vacant or underutilized and are often overlooked by the development community because of site constraints and perceived or known environmental contamination. Early Rockford industries, such as the production of farm machinery (JI Case), textile machines (Barber Colman), and furniture manufacturing, Rockford National Furniture Company and others, all left the area over time. JI Case closed its 30 acre plant in 1970 while Barber Colman closed its 15 acre plant in 1982. Most Furniture Manufacturing Companies shut down during the Great Depression of the 1930's.

This dramatic shift in industrial location towards the outlying highway system was also a major contributor to the shift in gasoline stations from the older commercial corridors, including Downtown, to the modern highway system and the newer commercial corridors. Desktop Phase I Environmental Site Assessments have identified nearly 100 former gas station sites within a one mile radius of the center of Downtown Rockford, 53 former gas station sites on West State Street which had been US 20 until the Bypass was built in 1966. Similar numbers of former gas station sites can be found at other older commercial corridors such as the Illinois 251 corridor (formerly US 51), Kilburn Avenue (Illinois 70, a minor state route that is only 25 miles in length) and other local streets that are old commercial areas. Commercial area blight is commonly found in these older commercial corridors.

Although this is a community-wide grant application, this Brownfield effort is targeted for the areas of the City most impacted by blighted commercial corridors with a large number of former gas station sites which are frequently blighted Brownfields. The Targeted Community for this Petroleum

Assessment Grant is a 12 Census Tract area located west, south and east of Rockford's Downtown. These Census Tracts are the most impacted by these blighted commercial areas. This twelve Census Tract area, Census Tracts 10-13, 21, 25-29 and 31-32. will be referred to as the Targeted Community for this Petroleum Grant Application. The Targeted Community includes the areas generally referred to as the "Southwest Side", the "West Side" and the "South Side" of Rockford. The Targeted Community includes over 30 "Neighborhoods". (Neighborhood Network)

Located within the Targeted Community are seven Petroleum Brownfield Corridors. Each of these seven Petroleum Brownfield (PB) Corridors has a severe impact on the adjacent neighborhoods comprising the Targeted Community. Once thriving areas with hundreds of workers and nearby business districts serving these workers, these 7 PB Corridors are each detrimental to the nearby neighborhoods. Over time the Targeted Community has experienced a major decline in population and increasing levels of poverty and crime largely due to the lack of employment opportunities in the immediate area. Environmental Assessment, Cleanup and Redevelopment of these Brownfields into facilities that provide jobs, training or other assets for the Targeted Community is imperative.

*ii. Demographic Information*

	Target Community (12 Census Tracts)	Rockford	Illinois	National
Population:	32,062	152,138	12,848,554	311,536,594 <sup>1</sup>
Unemployment:	20.0%	8.3%	5.3%	5.5% <sup>2</sup>
Poverty Rate:	49.8%	25.5%	14.1%	15.4% <sup>1</sup>
Percent Minority:	73.1%	43.2%	33.6%	36.7% <sup>1</sup>
Per Capita Income:	\$10,943	\$21,570	\$29,666	\$ 28,155 <sup>1</sup>
Never Finished HS	29.67%	17.47%	12.7%	14.0% <sup>3</sup>
<sup>1</sup> Data in this row is from the 2009-2013 American Community Survey 5 year est. available at: <a href="http://www.census.gov/newsroom/releases">http://www.census.gov/newsroom/releases</a> Data was compiled by Health Systems Research <sup>2</sup> Data in this row , except for the Target Community, is from the Illinois Monthly Labor Force Report, Illinois Department of Employment Securities, October 25, 2015 Report; Target Community Data is an estimate based on survey work within portions of the Targeted Community				

Several pertinent indicators of the welfare and economic challenges within the Targeted Community are shown in the above table. First, it is important to note that these indicators are even more dramatic when compared to the State and National figures which are very close. Unemployment, poverty, percent minority and never finished high school are all 50% to 100 % higher than the City of Rockford as a **whole but 2, 3 or more times higher than the Illinois or National figures**. The poverty rate is the most striking at 95% higher than the City rate and 320% higher than the National rate. In addition, there are several other indicators of the concentration of sensitive populations within the Targeted Community. In the Targeted Community 19.71% of the households are single parent female households compared to only 12.26% in the City as a whole and 51.7% of the households have public assistance income during the past year compared to 25.7% in the City as a whole. There is also a concentration of children in the Targeted Community, with a 19.73% figure (15.02% City) for children under 10 and 7.63% (7.11% City) for children 10-14. The Targeted Community is also a predominantly renter-occupied area, with owner-occupied units accounting for only 31.76% of the occupied units compared to 56.07% in the City as a whole. The housing stock has a median year built of 1945 compared to 1960 for the City as a whole. Five of the twelve Census Tracts in the Targeted Community have a housing stock from 1939 or earlier. This is particularly important to consider

because lead-based paint was not banned until the late 1970's. These demographics clearly demonstrate the concentration of sensitive populations living in very old rental units. (US Census, American Community Survey, 2009-2013).

One additional indicator of the need to focus on the Targeted Community is population gain or loss. Not surprisingly, the Targeted Community has experienced a major decline in population since 1970, declining from 47,412 in 1970 to 32,225 in 2010 (32,062 for 2013). This was a 32% drop in population during the time that the City of Rockford grew from 147,370 to 152,871, a 3.7% increase. More importantly, the Targeted Community accounted for almost one third of the City's population in 1970 (32.2%) but only 21.1 % of the City's population in 2010. This is a direct result of the numerous plant closings during this period and the resulting major decline in jobs and business activity in the Targeted Community. It is not surprising that there was no major grocery store located within several miles of the Targeted Community for almost 25 years until the City of Rockford, with assistance from USEPA and HUD funding, developed a grocery store in 2004 on a former Brownfield site within the Targeted Community on South Main Street.

### iii Description of Brownfields

The Targeted Community (12 Census Tracts: 10,11,12,13,21,25,26,27,28,29,31,32) includes a total of seven (7) Petroleum (site) Brownfield (PB) Corridors all located within the Targeted Community. These PB Corridors are as follows: **1) The West State Street Corridor** is original US Route 20 and it became Business US 20 once the Bypass was completed in 1966. A desktop Phase 1 in 2007 identified 53 potential petroleum Brownfield sites within this corridor. Only twelve of these sites have been fully assessed to this point, most located in the eastern section of the corridor. This corridor is located within 2 of the Census Tracts comprising the Targeted Community **2) The Auburn Street Corridor** is an older commercial corridor with several former gas station sites. It is crossed by the Canadian Pacific (former Milwaukee Road) rail line which has a former petroleum tank farm adjacent to the rail line, near, but north of, Auburn Street. This Corridor is located in Census Tract \_\_ **3) The Kilburn Avenue Corridor, located in Census Tract**, is an older commercial corridor that somewhat parallels the Canadian Pacific Rail Line mentioned above. Not only does it have several former gas station sites, including one that had been the site of a murder during the early 1980's, it also has a major auto salvage yard. **4) The Morgan Street Corridor** includes former gas station sites and two small-scale former auto salvage yards. This Corridor is located in Census Tract 28. **5) South Main Street Corridor** has several former gas stations and a former bulk oil terminal adjacent to the Canadian National Rail Line where it crosses South Main Street. This corridor is located in Census Tracts **6) The Kishwaukee Street (Illinois 251) Corridor** has several former gas station sites and three auto salvage yards, one of which is abandoned and **7) Downtown.** This area is defined as the area within a one-half mile radius of the Winnebago County Courthouse (300 West State Street) and within one-half mile radius of City Hall (425 East State Street). This elliptically shaped area has had Phase I Environmental Site Assessments performed for 12 of the 100 former gas station sites. Before the mid 1960's, nearly 100% of all gas station sites within the City of Rockford were located with the 7 Brownfield Corridors identified above. The Targeted Community of neighborhoods surrounding these corridors also included nearly all of the industry within the City of Rockford until approximately this same time.

### iv. Cumulative Environmental Issues

For over 100 years, virtually all industry as well as nearly all gas stations and petroleum bulk terminals in Rockford were located within the Targeted Community in or near these seven Brownfield Corridors. In addition, there were coal-fired-power plants, coal gasification plants, active landfills all located within the Targeted Community. The Coal fired power Plants were located in the Downtown Brownfield Cluster. The coal gasification plants were also located in the Downtown Cluster. The Peoples Avenue Landfill is located in the Kishwaukee St/ Ill. 251 Brownfield Cluster.

It is important to note that the City of Rockford Public Water Supply System is the most extensive public water supply well system in the State of Illinois. Currently, the public water supply is provided by 29 wells nearly all of which are deep wells, 1400 feet or more. Several previously operating wells, a total of 13, have had to be shut down because of contamination, primarily VOC contamination. All of these closed City wells except one are located within the Targeted Community, the area impacted by Brownfield concentrations. One relatively new well, Well 37 (1985), had to be retrofitted with a water treatment system to remain operational because of VOC contamination. This retrofit was at a cost of \$2.0 million dollars. Well 37 is located within the Targeted Community in proximity to Brownfield Cluster # 2.

The Targeted Community has a high percentage of minority and low income residents and a lack of proximity to jobs, a job “desert”, in an area where the residents once walked to work. Major areas have been determined to be “Food Deserts” by USDA. These factors coupled with the environmental issues ranging from air pollution to contaminated wells clearly identify environmental justice concerns. The City needs to have the resources to attack these Brownfields and produce jobs and services for the community such as the grocery stores and general merchandise.

#### **b. Impacts on the Targeted Community**

\* Disproportionate impacts on the targeted community including health disparities:

The cumulative effects of the contaminated wells, the airborne pollution from the power plants and factories as well as the contaminated soil at the Brownfield sites are difficult to measure. However the USEPA Environmental Justice (EJVIEW) website, 2005 data, provides health indicators that showed higher health risks within the Targeted Community than in the City as a whole. Neurological Risk was at less than .1 per cent of the population for 41 of the 51 Census Tracts in the City of Rockford, but the Targeted Community had 8 of its 12 Census Tracts in the higher .1 to .3 percent range. For Cancer Risk, 31 of the 51 City Census Tracts had a Cancer Risk of 30-50 per million. Of the 12 Census Tracts in the Targeted Community, 8 had a Cancer Risk in the 50-75 per million range and 3 of the remaining 4 Tracts had a Cancer Rate at the highest local level of 75-150 per million. Total Respiratory Risk was 2.5- 4 % for 45 of the 51 City Census Tracts. Five tracts in the Targeted Community had higher risk levels with 3 tracts in the 4-6% risk level and the other 2 tracts were at the 6-10% risk level. Clearly the Targeted Community and its sensitive population of young children demonstrate several health disparities that affect livability and quality of life in this area.

In addition, Winnebago County Health Department Statistics for blood lead testing in children show that the Targeted Community has much higher lead levels than the City as a whole. These figures are available for a two year period, (8-1-07 to 8-31-09). This data was gathered by Zip Codes and not available at the Census Tract level. This data shows higher incidences of elevated lead levels in the bloodstream for the US Postal Zip Codes that include the CW Targeted Community. Zip Codes 61101 - 61104 include the entire Targeted Community and showed 237 children or 4.5% of the 5,270 children initially tested had blood lead levels at 10 or more micrograms per deciliter. The County wide figures show that 290 of the 10,157 initially tested (2.9%) had high lead levels. If the 61101-61104 Zip Codes (Targeted Community) are not included, the entire county excluding these four zip codes has an incidence in the initial test of only 1.1%, 53 out of 4887 tested.

The high incidence of elevated lead levels among the children of this four Zip Code area that includes the entire Targeted Community, coupled with the higher rates of cancer, respiratory illness and neurological disorders coupled with the socioeconomic and housing data clearly show that the Targeted Community is an area with environmental issues as well as an older housing stock where lead-based paint has not been abated and the housing stock is deteriorating due to disinvestment by

the property owners; children being exposed to peeling lead based paint . This disinvestment in the housing stock is symptomatic of an area impacted by Brownfields.

\* Threats to health or welfare of sensitive population within the Targeted Community: The Health Statistics documented above show the disproportionate impact to the Targeted Community, the community that is subject to environmental exposures from Brownfields. The Demographic Information presented previously clearly shows a disproportionately higher percentage of these sensitive population groups in the Targeted Community. These indicators coupled with the health indicators clearly show the threats to health and welfare of the sensitive populations in the Targeted Community. Median income, poverty rate, single parent female households, children under 10, and children under 15 are among the sensitive populations that are more prevalent in the Targeted Community. Another Disproportionate impact on the Targeted Community is the shortage of neighborhood parks. The Rockford Park District has determined that every resident should be within walking distance, one half mile with no barriers, from a neighborhood park. Although most of the Targeted Community meets that standard, Brownfields are often closer to the residential areas and may draw children there. These Brownfield sites pose a potential health risk to children who may play there because they are close and they may be attractive nuisances.

\* Many of the health issues reported for the Targeted Community appear to be linked to the Brownfield Corridors. The most significant example of the exposure to toxic substances within the Targeted Community is the 12 well closures within the Targeted Community. It is difficult to determine how long the residents in the Targeted Community were exposed to these VOCs or, in the case of one well, Chromium, before the contaminants were detected and the wells were closed

### **c. Financial Need**

i) Economic Conditions: The City of Rockford needs the Assessment Grant funding for several specific reasons: First, with the completion and closeout submittals for the FY 2011 Assessment Grants, the only Assessment Funds currently available to the City for Assessments are very restricted Illinois EPA River Edge Funds. These funds are restricted to City-owned property located within the River edge zone, are site specific and are only for soil and groundwater contamination and are intended primarily for Cleanup activity. Only 30% of the Targeted Community is located within the River Edge Zone, there is no way to use these funds to assess privately owned property that the City is attempting to acquire, and interior issues such as oil-soaked wood block flooring , are not included in the River Edge Program. USEPA Assessment Grant Funds would be extremely beneficial in providing sites for the River Edge program if located within the River Edge Zone. Second, currently, October of 2014, the unemployment rate is 10.0% for the City, the highest unemployment of any community of over 30,000 populations in the State of Illinois. Local studies suggest that the unemployment rate in the Targeted Community is double the City rate. The current unemployment levels are clearly more severe for the City of Rockford and the Targeted Community than the surrounding area as evidenced by the 8.40 % figure for the Rockford MSA, the State of Illinois, 6.2%, and the US as a whole 5.5%. (Illinois Monthly Labor Force Report, Illinois Department of Employment Security; U.S. Department of Labor, Bureau of Labor Statistics, Oct. 2014 data).The Targeted Community's high unemployment rate is one of many reasons why the assessment, cleanup and redevelopment of the Brownfields are so important to the future well-being of the Targeted Community. Local economic conditions have also been impacted by industrial decline and resulting decline in manufacturing jobs as well as two natural disasters, the 2006 and 2007 floods (500 year) that occurred in the Keith Creek basin resulting in the removal of over 100 homes and five businesses. Declining property values and revenues, due to the Great Recession, stagnant retail sales tax revenues, major bond issues for major capital

investments and municipal budget pressures to fund public safety first responders and their pensions have all contributed to the City's serious need for additional funding for Brownfield Assessments.

ii Economic Effects of Brownfields

Income and poverty level indicators on page 2 all show that the Targeted Community has an economically disadvantaged population with several economic indicators showing poverty and economic distress levels at up to two times or higher than the levels for the City as a whole. Income levels are considerably lower than the City as a whole, over 44% lower. (American Communities Survey 2009-2013). It is no coincidence that the Targeted Community demonstrates such high levels of economic need. Each of these socioeconomic indicators strongly shows an economically disadvantaged population that is disproportionately minority in composition. The combination of the concentration of Brownfields, lack of basic retail and other services, the aging housing stock, and general lack of investment by the private sector have resulted in a precipitous decline in the viability of these neighborhoods. During the past 30 years, building permit records show that there have been only a handful of new commercial developments within the entire Targeted Community that were not subsidized by the City in some way, such as TIF financing. In addition, these commercial developments that did take place, such as Aldi Foods and Walgreens are located on the periphery of the Targeted Community. Although this is largely due to the private sector generally avoiding economically distressed areas, the numerous Brownfield sites and their blighting influences are detrimental to private developers looking for suitable sites. (City of Rockford, Department of Community and Economic Development. These trends will continue unless these Brownfields are assessed, cleaned and redeveloped). The Assessment Grant Program proposed in this application would be a major step in the redevelopment of the Brownfield areas to productive uses including providing employment, retail goods and services, new housing, park and open spaces and offices.

**2. Project Description and Feasibility of Success**

**a. Project Description, Project Timing and Site Selection**

i. Project Description: The City of Rockford proposes to perform Phase I Environmental Site Assessments at a minimum of 10 Brownfield Sites. These Phase I ESAs will be performed as a pre-requisite to City of Rockford acquisition of Brownfield sites within the seven Brownfield Corridors identified on pages 3 and 4. Many of these Brownfield Corridors have had a recent detailed Corridor Plan prepared; the "South Main Revitalization Strategy" completed late in 2011 by the Lakota Group, includes Brownfield Corridors 4 and 5. Corridor improvements will be under construction by the Illinois Department of Transportation during 2015 and 2016. The Kishwaukee Corridor Study, completed during 2010, includes Brownfield Cluster 6. Revitalization was prepared for the Auburn Street Corridor (Cluster #8) as part of the Auburn Street Corridor TIF creation, completed during February of 2014. Brownfield Cluster #1, West State Street is in the second phase of corridor improvements by the Illinois Department of Transportation in compliance with the "Business US 20 West State Street Corridor Study" completed during 2002. Also, some "Corridors" have had a comprehensive Desktop Phase I performed, site prioritization determined, and/ or an eligibility determination matrix prepared and approved by USEPA. As a result of these revitalization plans and initial assessment activities, conducting the Phase Is will not require extensive preliminary work in most cases. The City will be working with the Brownfields Redevelopment Advisory Committee to identify and recommend new sites for the IEPA River Edge Program starting in January of 2015. These recommendations will be brought to Public Meetings out in the community for community input prior to final selection by the City Administration. This process will be continued for the USEPA Assessment Program once grants are announced in the spring of 2015. The major difference will be the geography, River Edge is a more confined geography than the USEPA program. The City will

emphasize potential assessments in Brownfield Corridors that have not had Phase I assessments in the past. Phase I ESA's will be conducted at a minimum of 10 sites following this site selection. Phase II Environmental Site Assessments will be performed at a minimum of 6 sites. At least 3 sites will be selected for Cleanup and Redevelopment. The Cleanup Planning Reports will be prepared and these sites will be enrolled in the Illinois EPA Site Remediation Program for potential use of the existing IEPA River Edge Grant for Cleanup. Some of the Phase II ESA work will likely take place in the West State Street Corridor and South Main Street Corridors in conjunction with the corridor improvements. Funding will be focused on the Phase II work with 50% of the funding allocated to this Phase II work.

ii. Project Timing: The City will begin its procurement of environmental consultant(s) through its standard RFQ/RFP procurement process once the awards have been announced and the Work Plan has been finalized. Priorities for Petroleum Phase I ESA's will be identified with input from the Brownfield Redevelopment Advisory Group during early 2015 so the City is ready in advance of the awards. The main reason for this urgency is the fact that the second phase of the West State Street Corridor Improvements is in the early land acquisition step. There are known to be at least 20 former gas station sites within this second phase of the West State project, as determined by a 2005 Desk Top Phase 1 for the whole corridor. Many of these sites will need to be assessed during 2015 prior to City acquisition. A spreadsheet of the selected Brownfield sites will be prepared and maintained by the City and Consultant(s) and used as input to the Quarterly Reports and Acres. Following completion of the Phase Is, potential Phase II sites will be identified then selected and the Quality Assurance Program Plan (QAPP) and Health and Safety Plan (HASP) will be prepared and approved. The City will then track each site using the Spreadsheet as an important tracking tool. The built up need for Assessment funding to complement the existing RLF Petroleum Funds (over \$500,000 not yet programmed) insures prompt completion of the Assessment Grant Work

iii. Site Selection: City staff will conduct a bus tour of the seven Brownfield Corridors with Brownfield Redevelopment Advisory Committee (BRAC) members, City staff, including the Capital Improvements Manager, and City Administration Members. Detailed maps and aerial photos of each Brownfield Cluster will be provided as well as known acquisition plans and redevelopment, especially for known capital improvements such as West State Street and South Main Street. The recommendations of the BRAC will be considered by the City Administration and City Council. The timing of the West State Street Corridor Improvements (Phase 2) and the extensive land acquisition required for this specific project will be important considerations.

## **b. Task Description and Budget Table**

### **i. Task Descriptions**

#### **Task 1: Site Prioritization & Eligibility Determinations**

The City has identified seven Brownfield Corridors as part of this grant application. A listing of the properties in these areas will be compiled through the use of Winnebago County's Geographic Information System (WINGIS). This is information that is fully assessable by City staff. Funds are not needed to identify sites. Our intent is to utilize the grant funds within this Task to prioritize the sites. The Brownfields Redevelopment Advisory Committee, which has been dormant for a few years, will meet in January of 2015 and will include the Aldermen representing each of these seven (7) Brownfields Corridors as well as area stakeholders and representative from the Targeted Community. This Committee will provide valuable insight in the prioritization of these sites. Once the sites have been prioritized, the eligibility determination information will be gathered and submitted to USEPA for review. In the case of commingling of hazardous substances with petroleum, the Illinois EPA will

be included. The Bus Tour, as described above, will be a major element of site selection/prioritization. The Output will be a prioritized list of sites.

**Task 2: Conduct Phase I Site Assessments – Individual Sites**

Once sites are prioritized, eligibility determinations have been completed and accepted, Phase I Environmental Site Assessment (ESA) will be conducted using ASTM E1527-13 standard. All Phase I ESAs will be prepared in accordance with the ASTM E1527-13 standard, which has been approved by USEPA as demonstrating that the All Appropriate Inquiry has been conducted. The City anticipates conducting ten (10) to fifteen (15) Phase I assessments with the Petroleum funds at an average cost of \$2,500 per site. The Output will be 10 plus Phase Is prior to City site acquisition.

**Task 3: Phase II Environmental Site Assessments**

The City anticipates conducting six (6) to nine (9) Phase II ESAs with the Petroleum funds based on the results of the Phase I ESAs. The Phase II ESAs will be the primary focus of this Assessment Grant with \$100,000 programmed in the Budget Table. The number of assessments conducted will, in part, depend upon the size of the selected properties and the nature and extent of the contamination involved. The three (3) following items must be completed by our contracted Brownfields consultant(s) prior to commencing with any Phase II ESA activities. First the contracted consultant must prepare and receive approval from EPA of a Quality Assurance Project Plan (QAPP), Health & Safety Plan (HASP), and the site-specific Sampling and Analysis Plan (SAP). The Phase II ESAs will be compliant with Illinois EPA Site Remediation Program (SRP) standards. The costs of Phase II ESAs vary widely. Overall Phase II ESA costs \$7,500 to \$45,000 per Petroleum site. Our intent would be to prepare the enrollment application and take the results of the Phase II ESA work and present that information in the form of a Work Plan with the application. The Work Plan will detail the investigative activities needed to define the lateral and vertical extent of the discovered contamination. It is important to note that some of the Phase II ESA's will stem from Phase I's conducted under the previous Assessment Grant. It should also be noted that Green Site Investigation and Cleanup Techniques derived from the ASTM E2893-13 (Standard Guide for Green Cleanups) will be encouraged. The Output will be 6 or more Phase II ESAs.

**Task 4: Prepare Remedial Action Plans (Cleanup Plans)**

Following the SRP enrollment (budgeted in this task) and the completion of the Site Investigation step as part of the SRP process, Remedial Objectives/Remedial Action Plans (ROR/RAP) will be prepared. We intend to prepare plans for the three (6) to nine (9) Phase II ESA properties, based on the number of sites requiring cleanup and the amount of funding remaining once we get to this step. This task also includes paying for IEPA project management fees for regulatory review and approval of plans submitted to the IEPA for review under the SRP. The IEPA voluntary cleanup programs are fee-for-service programs. Since all sites for which Phase II ESAs are conducted will be enrolled in the IEPA programs, oversight fees will accumulate beginning with the review of the proposed Phase II Assessment work plan. It should be noted that the City may select one or more sites requiring Cleanup for the Illinois EPA River Edge Program if these sites are high priority and located within the River Edge Zone. The Output will be 6 Remedial Action Plans at enrolled sites.

**Task 5: Community Involvement** The objective of this task is to inform the community as a whole and the communities in the Brownfields Targeted Areas of: a) the City's intent to conduct environmental assessment activities; b) community input concerning the priorities for assessment activities and future redevelopment; c) the assessment results; and d) cleanup plans and redevelopment efforts. This Community Involvement is documented in detail in Section 3 Community Engagements and Partnerships and will include the BRAC. Supplies will include display boards, informational brochures and large prints. The Output will be a total of 12 Public Meetings per year for site selection, assessment results, cleanup plans and reports on cleanups in process.



### Task 6: Programmatic Activities

As part of the grant process, the City will utilize City staff to prepare all quarterly grant reports, the semi-annual MBE/WBE reports and the annual financial reports. . We also intend to have 2 City staff attend 2 national Brownfields conferences including related travel , lodging and expenses.

#### i) Budget Table

### ***Petroleum Assessment Grant Proposal Budget***

<b>Budget Categories</b>	<b>Task 1:</b>	<b>Task 2: Phase I ESAs</b>	<b>Task 3: Phase II ESAs</b>	<b>Task 4: Cleanup Planning</b>	<b>Task 5: Community Involvement</b>	<b>Task 6: Program matic Activities</b>	<b>TOTAL</b>
<b>Personnel</b>							
<b>Fringe Bnfts.</b>							
<b>Travel<sup>1</sup></b>						\$ 3,000	<b>\$ 3,000</b>
<b>Equipment<sup>2</sup></b>							
<b>Supplies</b>					\$ 2,000		<b>\$ 2,000</b>
<b>Contractual<sup>3</sup></b>	\$ 7,500	\$ 27,000	\$100,500	\$ 40,000	\$ 5,000		<b>\$ 180,000</b>
<b>Other: IEPA SRP Fees</b>				\$ 15,000			<b>\$ 15,000</b>
<b>USEPA Grant Total</b>	<b>\$ 7,500</b>	<b>\$ 27,000</b>	<b>\$100,500</b>	<b>\$ 55,000</b>	<b>\$ 7,000</b>	<b>\$ 3,000</b>	<b>\$ 200,000</b>

**c. Ability to Leverage:** The Community Wide Petroleum Assessment Grant is extremely important to the City of Rockford to identify sites needing soil and groundwater cleanup so the IEPA River Edge Program can potentially be programmed to provide some of these Site Cleanups and Brownfield Redevelopment. The City of Rockford will make every effort to utilize the Illinois EPA River Edge Program to perform Cleanup at sites that have been assessed through the USEPA Assessment Grant Program. The City currently has \$800,000 remaining in this program and will have at least \$585,000 once the cleanups at Tapco have been closed out with the No Further Remediation Letters. This funding will enable the City to perform soil and groundwater cleanups at sites identified and prioritized through this Assessment Grant Program. If needed, it may also be used to complete Cleanup projects that have USEPA Grant Funding, the Lorden Eclipse and Depot sites, or may be funded through the USEPA Supplemental RLF Program for which the City currently has \$1,000,000 in Petroleum Funds, \$350,000 in Hazardous Substance Funds and \$412,000 in Program Income Funds. This Petroleum Assessment Grant would complete the City's funding for several additional sites. In addition to the IEPA River Edge Program, the City has received funding and funding commitments from Illinois Department of Commerce and Economic Opportunity for improvements to Davis Park located between two current major Brownfield Redevelopment Sites, the Ingersoll Indoor Sports Complex and the Amerock Downtown Hotel and Convention Center both scheduled to be completed during 2016 at a total cost of over \$60 million. The City has made a commitment for a General Obligation Bond of over \$12 million for the Indoor Sports Complex and Capital Improvements to assist in the Downtown Hotel and Convention Center Projects. Funding Commitment documents are attached in Attachment e.

### **3. Community Engagement and Partnerships**

#### **a. Plan for Involving the Targeted Community and other Stakeholders; and Communicating Project Progress:**

i Community Involvement Plan: Rockford understands the importance of involving the community in Brownfield redevelopment. The City of Rockford has been actively involved in the community in its Brownfield initiatives. Wayne Dust, local Brownfield Coordinator and Planning Administrator for the City of Rockford, has presented an overview of the City's intent to apply for USEPA Brownfield Grants and has provided status reports for all assessment and cleanup projects on a regular basis at the Fifth Ward meetings throughout the last five years at the Montague Branch Library and at Public Hearings just prior to City Council meetings. It is important to note that three of the seven Brownfield Corridors are located in the Fifth Ward. It is also important to note that a presentation was made by Mr. Dust concerning USEPA Cleanup activities (RLF Program) at the September 25<sup>th</sup>, 2014 Fifth Ward Meeting. During February of 2015, the Brownfields Advisory Committee will be seeking community input concerning potential Brownfield sites from the Fifth Ward for the IEPA River Edge Program as well as the USEPA Assessment Program.

In addition to the efforts in the Fifth Ward, the Brownfields Coordinator has worked with other Alderman whose wards have Brownfields issues including Tom McNamara(Third Ward) Ann Thompson-Kelly (Seventh Ward) and Linda McNeely. (Thirteenth Ward). It should also be noted that the Third Ward and Thirteenth Ward each include two (2) of the Brownfield Corridors. The Brownfields Advisory Committee will meet with these alderman and representatives from their respective wards. Mr. Dust will also work with other Aldermen where a major portion of one of the Brownfield Corridors is found. The Ward Meetings conducted by these Aldermen will be used as a venue to inform these communities of these programs and identify potential redevelopment projects. It is important to note that neighborhood organizations, business organizations, lenders, realtors, developers, residents and property owners are regular participants at these Ward meetings..

ii. Communicating Progress: The City will also increase its efforts to use its website to inform the community of its Brownfield Assessment and Cleanup Projects and their status. Another form of public engagement that will be used will be workshops conducted throughout the Community in conjunction with the update of the City's Comprehensive Plan, the 2020 Plan. This Community outreach is currently ongoing.

#### **b. Partnerships with Government Agencies**

i Local and State Environmental and Health Agencies: Illinois EPA: the Illinois EPA Voluntary Site Remediation Program (VSRP) works in conjunction with USEPA Region 5 to provide Cleanup Oversight for all sites enrolled in the VSRP. Successful completion of a site Cleanup or demonstration, through Phase II ESA reporting, that no contamination exists will result in a No Further Remediation Letter. In Illinois, receiving this NFR letter is a prerequisite to Brownfield Redevelopment. As identified previously, the Illinois EPA has also awarded \$1million in Brownfields Cleanup funding as part of the River Edge Zone Program. This has created a major new opportunity to partner with IEPA on redevelopment projects that are planned for Brownfields sites requiring cleanups. The IEPA funds are severely restricted and do not include cleanup other than soil and groundwater. Combined with USEPA programs, however, the City will continue to tap into this valuable resource to accomplish the redevelopment of Brownfield sites. Mr. Dust frequently meets with Steve Colantino and Mike Charles at IEPA concerning this program and potential Cleanup projects.

The City is actively developing partnerships for Brownfield redevelopment projects at the local, state, and Federal levels. At the Federal Level, the US EDA recently selected the City of Rockford for the ***Strong Cities, Strong Communities Initiative***. Under this initiative, two Federal employees have

moved into offices in the City Hall to provide assistance to the City in seeking Federal Grants for economic development initiatives. At the local level, the City frequently partners with the **Rockford Park District** on Brownfield Redevelopment for parks and recreational facilities. The Rockford Park District is a separate regional taxing district with an elected governing board. The District has been a long term Community Partner with the City and has coordinated planning efforts for several decades. An important example is the recent Intergovernmental Agreement between the City of Rockford and the Rockford Park District concerning the funding and operation of the Downtown Sports Complex at Ingersoll, a \$24 million dollar project that includes \$1.1 million in USEPA RLF Funding.

The **Rockford Metropolitan Agency for Planning (RMAP)** is the Metropolitan Planning Organization for the Rockford Metropolitan Area under the supervision of the Federal Transportation Administration. In recent years, RMAP has partnered with the City of Rockford specifically in the development of a new Amtrak Station, proposed at the site of the previous station where service had been terminated in 1982. This Depot Site and the adjacent Lorden site were acquired by the City of Rockford in September of 2010 from the Canadian National Railroad. The City received USEPA Cleanup Grants for these two adjacent sites and will perform this Cleanup during the Spring of 2015. Upon remediation of the Depot Site and Lorden Site, RMAP will channel funding commitments for the pre-construction phases of the Amtrak Station and will continue its efforts to secure funding for Amtrak Station construction.

### c. Partnerships with Community Organizations

#### i. Community Organization Description and Role

The following is a summary table describing the Community Organizations that the City is partnering and their role in the planning and implementation of the City's redevelopment and repurposing of Brownfield sites:

Community Organization	Description of Community Partnership	Level of Commitment: Formal Agreements	Contact Person, Title Phone
Rockford Local Development Corporation RLDC	Loan Recipient for 3 major RLF projects, \$2 million total	Several Development Agreements, wide range of programs/projects	John Phelps, Executive Director, 815-987-8675
Neighborhood Network	Community Action Gardens in Targeted Area	City Human Services Department Funding	Cyndie Hall 815-967-4034
United Way, Rock River Valley	Will Partner with City on Job Creation in 2 neighborhoods	Inter-Agency Agreement with City being developed	Paul Logli, Executive Director 815-968-5400
Natural Land Institute	Riverfront Brownfields to restored naturalized areas	Agreement with City to be developed	Kerry Leigh 815-964-6666
Next Rockford	Assist with Redevelopment Strategies	Informal meetings with City; BRAC -formalize	Scott Anderson 815-904-2407
Rockford Housing Authority	Will Partner with City on Job Creation in 2 neighborhoods	Inter-Agency Agreement with City being developed	Ron Clewer Executive Director 815-489-8500
River District	Assist with site selection and prioritization	Currently informal but will consider formal	Gary Anderson 815-963-1900
Rockford Area Economic Council	Assist with finding users of vacant industrial sites	Part Funding from City ; refinements ongoing	815-9878129

ii. Letters of Commitment: Letters of commitment are attached from each of the Community Organizations listed above in Attachment d.

#### **4. Project Benefits**

##### **a. Health and/or Welfare and Environmental Benefits**

**i. Health and/ or Welfare Benefits:** The eight Brownfield Corridors (BCs) have portions of the Rock River, Kent Creek or Keith Creek within their boundaries. In addition, they are all located in proximity to Downtown. The City of Rockford/ Rockford Park District plan for a continuous system of Greenways/Pathways along the Rock River and major creeks while linking with the major regional pathway system including the Grand Illinois Trail. Each of these BCs has redevelopment plans that include job creation or major commercial and residential developments that include a focus on walking, non-motorized transportation, and in bad weather, public transportation, as the primary means of transportation to work or for recreation. This focus on creating several development nodes that encourage non- motorized transportation as part of this lifestyle is an important means of promoting personal health and preventing pollution. In addition, the Greenways Plan includes converting one of the three (3) railroad trestles across the Rock River to a pedestrian bridge linking the recreation paths on either side of the river that will be located within the BCs. The City of Rockford now has ownership of this bridge. There will be welfare and public health benefits as the environmental assessments are taken to the site cleanup stages and beyond, both from the safe removal of the hazardous substances as these Brownfields are cleaned up and from the standpoint that the open space components and pathway extensions incorporated into the redevelopment plans for each Brownfield Cluster will promote a healthier lifestyle. Children will soon be able to play in new parks that are currently Brownfields. This healthy lifestyle will replace the air pollution, contaminated soil and groundwater impacts noted in the “Community Need” section at these locations and other sites as they are brought through the assessment cleanup and repurposing process .It is important to note that the Indoor Sports Complex at Ingersoll, the Downtown Motel and Convention Center at Amerock and the Amtrak Station at Tapco are all being interconnected with pedestrian improvements including widening of the pedestrian walkway across the Chestnut Street Bridge providing a maximum walking distance of two blocks. In addition, the former Burlington Railroad bridge across the Rock River will be converted to pedestrian use. This will provide an alternative 4-block scenic route from the Downtown Hotel to the Indoor Sports Facility with views of the other two rail bridges, the Fordham Dam and the original Ford of the Rock River from which Rockford was named.

##### **ii. Environmental Benefits**

The City of Rockford has an exemplary record of following through with the redevelopment of Brownfields that were originally the site of environmental assessments performed using the USEPA Assessment Grant. There have been extensive environmental benefits as a result of these efforts that started with the assessment program, were continued with USEPA Cleanup Grants , USEPA RLF Program Funds ,State of Illinois Grants and General Obligation Bonds. Three interrelated projects recently have gone through this process and will be completed by early 2016. These are the Indoor Sports Center at Ingersoll, the Downtown Hotel and Convention Center at Amerock and the Amtrak Station and support facilities at Tapco. These three projects total upwards of \$ 75 million in investment and they would not have been possible without the USEPA Assessment Grants. These projects will have numerous health, welfare, employment and economic benefits. They are also providing considerable Environmental Benefits including the following: 1)reduction in emissions due to the encouragement of pedestrian movement between the three anchor projects (the “park once and walk” parking management technique is imperative); 2) removal of considerable contamination at two of the sites preventing further contamination from reaching the Rock River and 3) soil and groundwater cleanup and the establishment of engineered barriers to prevent exposure to people using the three facilities and the connecting routes. Item 2 is particularly noteworthy because the City of Rockford has a particular incentive to improve the water quality in the Rock River because it has become a year –round habitat for a local Bald Eagle population which has been increasing over time. The Rock River

just below the Fordham Dam is a major feeding grounds for the local Bald Eagle population, many of which roost along the Rock River to the south of the Fordham Dam. Some of these roosting sites are Brownfields, such as Barber Colman.

## **b. Environmental Benefits from Infrastructure Reuse/ Sustainable Reuse**

### **i. Planning, Policies and Other Tools**

The City of Rockford is committed to promoting sustainable development, especially mixed use development that encourages live, work and play environments which focus on non- motorized transportation. The Indoor Sports Complex at Ingersoll is a good example of infrastructure reuse of a large vacant industrial structure that will not only become an indoor sports complex for local youth, but also be a LEED Certified Building combining energy efficiency and reduction in emissions. The Cleanup of the site has already prevented petroleum product from entering the adjacent Rock River and eliminated exposure routes from contaminated soil. Another major component of the infrastructure reuse at Ingersoll will be a walkway along the Rock River, which is an important part of the local infrastructure (State right-of-way). Although Ingersoll is a good example, all proposed redevelopments within the Brownfield Corridors will incorporate the following infrastructure reuse/sustainable reuse: LEED Certified Buildings (either new construction or adaptive reuse), restoration of native landscaping and storm water management and reuse innovations, especially the ability to incorporate surface water quality improvements. Brownfield Redevelopment is also a very effective tool in reversing sprawl, a significant problem that negatively impacted the City as documented in the City's 2020 Comprehensive Plan.

ii. Integrating Equitable Development or Livability Principles: the creation of live, work and play environments though promoting mixed-use developments within Brownfield Redevelopment Strategies has already been noted previously. One particularly good example here is the proposed redevelopment of the Amerock Building, Ingersoll Building and Tapco site. When these 3 developments are completed in 2016, the City will have a major Indoor Sports Complex, a major Downtown Hotel and an Amtrak Station. These developments will be interconnected by two pedestrian links across the Rock River. There will be numerous loft apartments, currently being renovated, coming on-line within two or three blocks of these sites. It should also be noted that the City frequently enacts site specific groundwater use ordinances, recycles demolition materials for reuse, and explores green remediation ordinances and policies.

### **c. Economic and Community Benefits (long-term benefits):**

i) Economic or Other Benefits: This important goal will be accomplished by the City's efforts in the seven Brownfield Corridors. Without the City's concern for the redevelopment of Brownfields and the USEPA programs to assist with these redevelopment efforts, there is considerable evidence that Brownfield Corridors would simply expand and intensify over time as more and more buildings and sites approach the end of their useful life. Instead, many buildings and sites have been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of these areas. Each Brownfield Cluster has a different potential. The Downtown Cluster, for example, because of the eminent development of the Indoor Sports Center at the Ingersoll, has potential for complementary development on nearby Brownfields and the enhanced property values and job creation due to increased tourism activity, restaurants, and other retailers. A nearby Brownfield site, the 13 story, 220,000 square foot City-owned Amerock Building will become a Hotel and Convention Center. There was no interest in this Building before the Indoor Sports Center was announced. Now the City has a comprehensive Development Agreement with Gorman and Company for capital improvements and funding. Similar comprehensive plans are in place or being developed at all of the 7 Brownfield Corridors. All these plans replace Brownfield properties with residences, retailers, offices, and public open space amenities/ destination points, all of which

contribute to the tax base directly or indirectly as these areas are revitalized. All include retail services for the surrounding community and job creation.

ii Job Creation Potential : Partnerships with Workforce Development Programs Planned efforts to promote local hiring and procurement; the City of Rockford, through its Tax Increment Financing (TIF) Districts has implemented a policy of increased funding by the City if the development agreement includes a requirement for new hires to be from within the community surrounding the TIF District. The Targeted Community includes 14 TIF Districts currently and includes all 8 of the Brownfield Corridors, so the implementation of this policy has been beneficial to the City's Brownfield Program overall and compliments this Assessment Grant. The City of Rockford partners with the Workforce Connection, an Illinois "workNetcenter" whose partners also include several State of Illinois Departments and others.

### **5. Programmatic Capability and Past Performance**

**a. Programmatic Capability:** The Brownfields Program Management System in place at the City of Rockford consists of the Planning Administrator, Wayne Dust, and support staff in both the Community and Economic Development Department (CED) and the Finance Department. Wayne Dust is the designated Brownfields Coordinator by USEPA Region 5 since 2003. Mr. Dust has a Master's Degree in Geography from Kent State University and over 41 years of City Planning experience, 33 years of which have been with the City of Rockford. He is a member of the American Institute of Certified Planners (AICP). As the Brownfields Coordinator, he manages the USEPA Brownfields Grants as well as the environmental consultants under contract with the City for the Brownfields Program. Wayne prepares the Quarterly Reports for each grant, maintains the spreadsheets, reviews the technical reports and invoices prepared by the environmental consultants and cleanup contractors, coordinates with the City Administration and other Departments, and communicates with the Aldermen and representatives of the Brownfield-impacted communities.

The support staff in the CED for the Brownfields Program will be David Sydney and Susan Diehl. Susan Diehl, Administrative Assistant to the CED Director, has a degree in Computer Science and 8 years of experience in payroll, accounts payable and general office administration. Ms. Diehl handles all payments to the environmental consulting firms under contract with the City of Rockford, and coordinates with Steve Stromquist of the Finance Department who performs the drawdowns from USEPA. MS Diehl also maintains and updates the CED Department Webpage including the Brownfields Section. It should be noted that the City's Website is Translated into over 40 languages by Google, so the Hispanic Community has quick access to the Brownfield Community. David Sydney has a Master's Degree in Planning from the University of Illinois and has 6 years of experience in Planning and Design in the private sector before coming to the City in August of 2013. David will assist with planning and design of Brownfield sites including adaptive reuse of structures on these sites.

The City currently has Fehr-Graham and Associates under contract to perform environmental assessment work under contract to perform Cleanup Oversight in conjunction with the current USEPA Cleanup Grant Programs at the Lorden/Eclipse and Depot sites, USEPA Cooperative Agreements BF00E01077 and BF00E01078 and for the Ingersoll Site Asbestos Removal and Engineered Barrier under the RLF Program (BF-00E45801-5). Please note that Fehr-Graham had performed the Phase I and Phase II Environmental Site Assessments for these sites and had prepared the approved Remedial Action Plans. In the event that the City of Rockford receives an FY2017 Assessment Grant, the City of Rockford will secure the needed environmental services through the City's Procurement Process.

**b. Audit Findings:** There has been only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by Mc Gladrey and Pullen for 2005, Finding 2005-7. This finding was concerning late reports. This issue was immediately addressed and there have been no adverse findings since that point in time.

**c. Past Performance and Accomplishments**

**i. Has a Current USEPA Grant and has Received USEPA Grants:** The City of Rockford recently received a Brownfield Assessment Grant for FY2016-Fy2019, BF .The Revolving Loan Fund Grant received additional funding for FY 2015 and several new Brownfield Cleanup projects have been identified. Two Cleanup Grants, BF-00 and BF are nearing completion and will be closed out during the second quarter of FY 2016.

1. Compliance with Grant Requirements : Each of the first three grants listed below has complied with Grant Requirements and has been closed out. Cooperative Agreement numbers are provided.

2. Accomplishments are summarized below for each of these grants:

Grant Description	Amount	Accomplishments: Assessments CA Number	Accomplishments: Cleanup CA Number	Redevelopment Project?/ NFR Letters
<i>Community Wide Assessment</i>	<i>\$400,000</i>	<i>14 phase I ESA's 6 Phase II ESA's</i>	<i>CA BF-00E00435</i>	<i>5 No Further Remediation Letters</i>
Cleanup Grant: Haz. and Petroleum	\$200,000	CA BF-00E00320	Draft NFR Letter (5 acre site)	\$24 Million Indoor Sports Complex
Cleanup Grant: Hazardous Subst.	\$200,000	CA BF- 00E00079	1 No Further Remediation Letter (.6 acre)	Future Amtrak Station Development. <sup>2</sup>
RLF Cleanup Grant: Petroleum	1,000,000	CA BF 00E45801-5	\$1,000,000 programmed to Ingersoll	\$24,000,000 Indoor Sports Complex; 65% complete
RLF Cleanup Grant Hazardous Subst.	\$1,050,000	CA BF 00E45801-5	\$700,000 to Tapco; \$450,000 to Ingersoll	\$24 Million Indoor Sports Complex; Future Amtrak Station

<sup>1</sup> Also included the demolition of two structures to complete soil and groundwater sampling

<sup>2</sup> The Indoor Sports Complex at Ingersoll is a \$24 million dollar project with a \$12 million general obligation bond from the City; project is 65% complete as of 12/1/2015; will open June of 2016 Originally the Amtrak station was planned for another site but was moved to the Tapco Site. Other leveraged funds included the Illinois EPA River Edge Program, the Illinois DCEO River Edge Program and the USEPA Cleanup Grant (FY2013).